



SOUTH COAST AIR QUALITY MANAGEMENT
ENGINEERING AND COMPLIANCE DIVISION
APPLICATION PROCESSING AND CALCULATIONS

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PERMIT TO OPERATE

Rule 219 Exempt Identical Replacement (change of serial no.)

APPLICANT:	INLAND LITHO, INC.
APPLICANT ADDRESS:	4305 EAST LA PALMA AVENUE ANAHEIM, CA 92807
FACILITY ID:	071704
EQUIPMENT LOCATION:	1220 FEE ANA ANAHEIM, CA 92807-1817

EQUIPMENT DESCRIPTION

APPL. NO. 495101 (Dev. D23, identical replacement of D17 – prev. A/N 347705, P/O F50537)

LITHOGRAPHIC PRINTING PRESS, KOMORI, MODEL SL-40, SERIAL NO. 329, 6 COLOR PLUS COATER, 40 INCH WIDE SHEET-FED, WITH AN INFRARED DRYER, 60 KW TOTAL.

APPL. 495201

TITLE V PERMIT REVISION - MINOR

BACKGROUND

Inland Litho is a commercial printer. The facility submitted application no. 495101 for identical replacement of a lithographic IR dry printing press. The new press is an identical replacement to the printing press D17 under A/N 347705, P/O F50537. This replacement is exempt from written permit pursuant to Rule 219(c)(3) which states that such equipment shall not require a written permit to operate if...

Identical replacement in whole or in part of any equipment where a permit to operate had previously been granted for such equipment under Rule 203, except seals for external or internal floating roof storage tanks.

This is a Title V facility and the serial no. was listed in the permit description. In order to register the change of serial no., this application was submitted [the fee for serial no. change of similar equipment is specified in Rule 301(c)(5)], along with an application for Title V minor



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revision. The model no. of the press is slightly different (SL-40 instead of L640) only due to the manufacturer's change in nomenclature; the new press is identical to the previous press.

There are no other changes to the permit description, operating conditions or the amount of materials used in the equipment. The proposed identical replacement is considered a "minor permit revision" to the Title V renewal permit issued on 4/28/2005, as described in the Regulation XXX evaluation. The Title V permit is in the RECLAIM facility permit program format. There are no notices of violation or complaints against this facility in last two years. One notice to comply no. D15254 was issued to submit an MSDS for a wash on 9/4/07; the N/C was closed on 9/6/07.

EMISSIONS CALCULATIONS

The facility is operating under VOC caps of 125 lbs per day and 2850 lbs per month. There is no change in any criteria pollutant or toxic emissions. The proposed change will not result in any equipment or facility emission increase. All emissions data in the previous permit application will be transferred to the new application. The NSR and AEIS emission entries for VOC for this equipment are summarized below.

<i>New A/N</i>	<i>Old A/N</i>	<i>Equipment limit</i>	<i>NSR Entry (lb/day 30 day ave)</i>	<i>AEIS Entry R1=R2 lb/hr</i>
495101 (D23)	347705 (D17)	none	24	5.2

RULE EVALUATION

REG II, IV, XI, XIII, and XIV

The proposed identical replacement does not result in any emissions increase. There are no other changes in the permit description, operating conditions or the amount of materials used in the equipment. Compliance with all the applicable District rules and regulations is expected.

REGULATION XXX:

This facility is not in the RECLAIM program. The proposed project is considered as a "minor permit revision" to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a "minor permit revision" as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).



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The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(vi).

This proposed project is the 1st permit revision to the Title V renewal permit issued to this facility on April 28, 2005. The following table summarizes the permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
1 st Permit Revision – Rule 219 exempt identical replacement of a litho press – add D23 and remove device D17	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility.